

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

J.G.,

Plaintiff,

vs.

**NORTHBROOK INDUSTRIES,
INC., D/B/A UNITED INN AND
SUITES,**

Defendant.

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CIVIL ACTION FILE

NO. 1:20-cv-05233-SEG

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND THE DEADLINE
FOR PLAINTIFF TO FILE A RESPONSE TO DEFENDANT’S
RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW
UNDER FEDERAL RULE OF CIVIL PROCEDURE 50 AS TO
LIABILITY OR, ALTERNATIVELY, AS TO PUNITIVE DAMAGES**

COMES NOW, Plaintiff J.G., and hereby files this unopposed motion to extend the deadline for Plaintiff to file a Response to Defendant’s Renewed Motion for Judgment as a Matter of Law Under Federal Rule of Civil Procedure 50 as to Liability or, Alternatively, as to Punitive Damages (Doc. 247). In support, Plaintiff states the following:

1.

On August 27, 2025, Defendant filed a Renewed Motion for Judgment as a Matter of Law Under Federal Rule of Civil Procedure 50 as to Liability or, Alternatively, as to Punitive Damages. (Doc. 247).

2.

The deadline for Plaintiff to file a response is September 10, 2025.

3.

Plaintiff requests a nine-day extension to September 19, 2025, to file a Response to Defendant's Motion. Plaintiff requests the extension due to the press of other matters.

4.

Defendant does not oppose an extension of the deadline for Plaintiff to file a Response to Defendant's Motion to September 19, 2025.

5.

This is the first extension Plaintiff has requested to file a Response to Defendant's Motion, and, therefore, Plaintiff respectfully requests that the Court grant the instant unopposed motion. The text of a proposed Order is attached hereto as "Exhibit A".

WHEREFORE, Plaintiff respectfully requests that this Court grant her Unopposed Motion to Extend the Deadline for Plaintiff to File a Response to Defendant's Renewed Motion for Judgment as a Matter of Law Under Federal Rule of Civil Procedure 50 as to Liability or, Alternatively, as to Punitive Damages.

Respectfully submitted this 5th day of September, 2025.

/s/ David H. Bouchard

David H. Bouchard

david@finchmccranie.com

Georgia Bar No. 712859

Oto U. Ekpo

oto@finchmccranie.com

Georgia Bar No. 327088

FINCH McCRANIE, LLP
229 Peachtree Street, NE
Suite 2500
Atlanta, Georgia 30303
(404) 658-9070 – Telephone
(404) 688-0649 – Facsimile

Attorneys for Plaintiff

CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing **Plaintiff's Unopposed Motion to Extend the Deadline for Plaintiff to File a Response to Defendant's Renewed Motion for Judgment** has been prepared with a font and point selection approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14-point size.

Respectfully submitted,

/s/ David H. Bouchard

David H. Bouchard

david@finchmccranie.com

Georgia Bar No. 712859

FINCH McCRANIE, LLP
229 Peachtree Street, NE
Suite 2500
Atlanta, Georgia 30303
(404) 658-9070 – Telephone
(404) 688-0649 – Facsimile

Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that Plaintiff, through her attorneys, has served a true and correct copy of the foregoing Motion into this District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Dated: This 5th day of September, 2025.

/s/ David H. Bouchard
David H. Bouchard
david@finchmccranie.com
Georgia Bar No. 712859

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Atlanta, Georgia 30303
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